



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

E-MAILED: September 4, 2012

September 4, 2012

Mr. Jeff Bradshaw, Associate Planner, [jeffreyb@moval.org](mailto:jeffreyb@moval.org)  
Planning Department  
City of Moreno Valley  
14177 Frederick Street  
Moreno Valley, CA 92553

## **Draft Environmental Impact Report (Draft EIR) for the Proposed ProLogis Eucalyptus Industrial Park Project (SCH. NO. 2008021002)**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

In the project description, the lead agency proposes construction of six warehouse distribution facility buildings totaling 2,244,419 square feet with 326 total loading docks. Building sizes will range from 160,106 to 862,035 square feet on a total 122.8 acre site. Operations at the proposed industrial park will include approximately 1,989 trucks operating 24 hours per day and 7-days per week. Construction is planned to begin in the fall of 2012 and be completed as early as the last quarter of 2013, with a possible opening year by 2016.

In the Air Quality Section, the Draft EIR quantified the project's construction and operation air quality impacts and found that those impacts exceeded the AQMD's recommended significance thresholds. As stated in the Draft EIR, air quality in our basin exceeds federal and state standards and presents numerous health risks to those living and working here. The AQMD staff appreciates that the project therefore includes mitigation measures that have the potential to reduce emissions including building energy efficiency measures, carpooling programs, and encouragement of alternative fueled vehicles. However, the project's air quality impacts remain substantially above AQMD thresholds after mitigation. This is due, in part, to the lack of enforceability of some mitigation measures. The AQMD staff recommends that the lead agency strengthen the project's mitigation measures and additionally provide further clarity to portions of the air quality analysis. Details are provided in the attached comments.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead

Mr. Jeff Bradshaw,  
Associate Planner

2

September 4, 2012

Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment  
IM:GM

SBC120718-01  
Control Number

### **Operational Mitigation Measures**

1. AQMD staff commends the lead agency for encouraging the use of alternatively fueled technologies to reduce the significance CO, VOC, NOx, PM10, and PM2.5 impacts. However, these measures are not enforceable and thus it is unclear how likely they will be implemented because tenants are only “encouraged to promote” them. AQMD staff recognizes that requiring warehouse tenants to place engine technology restrictions on their vendors presents unique challenges. Further, requiring standards for one development and not another can yield competitive inequalities. The AQMD staff therefore encourages the lead agency to work with our agency to develop a common set of measures that are enforceable and that reduce emissions to the maximum extent feasible for the many warehouse projects under consideration in the city.

Some of these measures could include:

- Requiring all on-site vehicles (hostlers, forklifts, etc.) to utilize zero or near-zero emission technology
- Requiring the installation of sufficient alternative fueling infrastructure (e.g., electric charging, CNG/LNG, hydrogen, etc.) for trucks on-site or within close proximity to the site to facilitate the use of these technologies
- Providing a phase-in schedule and goals for the introduction of zero or near-zero technology trucks (e.g., 10% by 2020, 20% by 2025, etc.) that visit warehouses
- Prohibiting the placement of loading docks or major truck routes within 500 feet of sensitive receptors

Should any of these measures be found infeasible, other measures should be considered that will reduce air quality impacts. The measures listed below have been used by other lead agencies including the City of Banning<sup>1</sup>, Riverside County<sup>2</sup>, City of San Bernardino<sup>3</sup>, and the San Pedro Bay Ports<sup>4</sup>, among others.

- At project start, all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
  - If the above clean truck requirement is infeasible, a phase-in schedule should be put forth that will feasibly achieve emission reductions as soon as possible, and faster than existing regulations. Should an alternative schedule be found necessary, the AQMD staff should be consulted prior to approving the schedule.

---

<sup>1</sup> Banning Business Park <http://banning.ca.us/archives/30/July%2013,%202010%20City%20Council%20Agenda.pdf>

<sup>2</sup> Mira Loma Commerce Center [http://www.rctlma.org/online/content/conditions\\_of\\_approval.aspx?PERMITNO=pp17788](http://www.rctlma.org/online/content/conditions_of_approval.aspx?PERMITNO=pp17788)

<sup>3</sup> Palm/Industrial Distribution Center <http://www.ci.san-bernardino.ca.us/civica/filebank/blobload.asp?BlobID=11793>

<sup>4</sup> Clean Trucks Program <http://www.cleanairactionplan.org/cleantrucks/>

- The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets the quantities and emission standards listed in the Draft EIR. This log should be available for inspection by city staff at any time.
- Prohibit all vehicles from idling in excess of five minutes, both on warehouse property and on streets in the General Plan Amendment area.
- The facility operator will ensure that onsite staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies [for example, by requiring attendance at CARB approved courses (such as the free, one-day Course #512)].
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the additional impacts through CEQA prior to allowing this higher activity level.
- Limit project operations to non-refrigerated warehouse types of trucks and appurtenances (e.g., transportation refrigeration units, TRUs) included in the project description and analyzed in the Final EIR. If this equipment and associated higher emissions are anticipated to visit the site, the lead agency should commit to re-evaluating project impacts through CEQA prior to allowing this higher activity level.
- Require at least a portion of the fleet to utilize alternative fueled technologies.
- At a minimum, require tenants upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the tenant should also be required to accept and use them.
- Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility.
- Restrict overnight parking in residential areas. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.
- Due to the large roof area associated with this project, consider installing solar roof panels to reduce emissions from fossil fuel based electrical generating technologies providing electrical power to the project site. At a minimum, buildings should be designed to allow the installation of solar panels at a later date.
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.

### **Trucking Support Services**

2. The project is projected to accommodate nearly 2,000 trucks on a daily basis. In addition to the project's 2.24 million square feet of warehousing, there are several other warehouse projects in the area, including a recently proposed 40+ million square foot project. The trucks from all of these warehouse operations do not currently have any facilities in this portion of the city to serve their specific needs. Trucking support services can include truck repair, fueling, and overnight parking, hotels, restaurants, banking, etc. If these services are not easily accessible to this

project or surrounding projects, then truckers may have no choice but to make extra trips into the surrounding neighborhoods to find these services. In other parts of the basin, these extra trips and idling in surrounding neighborhoods has led to increased emissions affecting local residents. The lead agency should address how these trucking services will be provided to truckers serving this project and the other nearby projects. Potential measures to consider include:

- Establish area(s) within the facility for repair needs.
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride.
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Design the warehouse/distribution centers to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.

### **Equipment Not Included in Air Quality Analysis**

3. The Draft EIR includes a Health Risk Assessment (HRA) that evaluates the impact from two sources, trucks and employee cars. Although the lead agency has proposed encouraging the promotion of near-zero emission yard trucks, it isn't clear if all applicable on-site equipment are accounted for and included in the health risk assessment. Equipment that is commonly found at warehouses that is not included in the HRA or the air quality analysis includes hostlers (e.g., yard trucks), diesel generators, and transportation refrigeration units (TRU's). The Final EIR should estimate the emissions from these equipment types or specifically prohibit their use onsite.

### **Health Risk Assessment Calculations**

4. Several parameters used to determine potential health risks for the proposed project require further explanation or recalculation in the Final EIR. In addition to the comments below, details that should be provided in the Final EIR include the EMFAC modeling output and the dispersion modeling output. Should you have any questions regarding these parameters, please call AQMD staff at (909) 396-3244. AQMD staff notes the following items that are unclear in the HRA:

- The HRA assumes that 2025 is a representative year from EMFAC2007 for the entire 70 year span of the project. Further justification is needed to

validate this assumption, especially considering the significantly higher emissions that are expected in the years preceding 2025, and the relatively unchanged emissions in the years following 2025.

- No emissions are calculated for onsite travel such as trucks traveling from Eucalyptus to building dock doors and back. Hostlers, diesel generators, and TRU's are also not included.
- The project description states that operations will occur 24 hours per day, 7 days per week while the HRA states that emissions will only occur 12 hours per day.
- The HRA assumes that half the trucks will travel east, while the other half travel west on Eucalyptus when exiting/entering the project site. The traffic study within the Draft EIR states that only 33% will travel west while the preponderance travel east.
- The HRA assumed that 12.5% of heavy duty trucks, 30% of medium duty trucks, and 80% of light duty trucks will use gasoline instead of diesel fuel. These values should be justified when considering the kinds of trucks that typically serve warehouses. AQMD staff recommends a default assumption of 100% diesel fueled trucks serving warehouses without further justification.
- The derivation of emission rates is unclear. For example, the HRA Emission Rate Worksheet shows a rate of 8.7E-05 g/s for heavy duty diesel trucks. AQMD staff was not able to reproduce this rate. For example, running EMFAC2007 at 70°, 50% humidity, year 2025, with a SCAQMD fleet yields an emission rate of 9.27E-05 g/s.
- It is not clear how the idling emission rate was derived.
- The effects of building downwash was included, however no mention was made that downwash does not work with volume sources in either the AERMOD or ISC dispersion model. In addition, if downwash is used in the final analysis, the building heights should match those found elsewhere in the Draft EIR. The HRA states that heights of 65 feet were used, however this is considerably taller than any building heights described in Appendix K.

### **On-Site Truck Idling Emissions**

5. In the health risk effects analysis, the lead agency assumes that 1,246 heavy duty diesel trucks will operate daily at the project site. On page 4.3-17 in the Air Quality Section, the lead agency used only five minutes of idling in the emissions estimate for the health risk assessment. Although state regulations only allow five minutes of idling at any one time, trucks may idle for five minute periods several times on-site (e.g., queuing to enter the site, at the loading dock, exiting the site, etc.). AQMD staff therefore recommends an assumption of 15 minutes for on-site idling. If less than 15 minute of idling is used in the HRA, a mitigation measure should be added that requires the project proponent to limit *total* onsite idling time to the time used in the health risk assessment.

### **Truck Categorization**

6. In the air quality analysis, the lead agency used the truck trip rate of 1.96 trips per 1,000 square feet of land use to estimate operational air quality impacts instead of the default CalEEMod land use model trip rate of 2.59. In addition, the lead agency assumed, as specified in the Transportation chapter of the Draft EIR, the vehicle fleet mix used to estimate truck emissions based on values recommended in the Fontana Truck Study. This study includes data for 2-axle, 3-axle, and 4+ axle trucks. Although EMFAC2007 also includes emission factors based on truck size, the splits are based however on vehicle weight, not axle. For the regional criteria pollutant calculations, the Draft EIR assumes that 2-axle and 3-axle trucks correspond to EMFAC2007 LDT1 and LDT2 vehicle classifications. LDT1 and LDT2 are for pickup trucks and are not typical of the higher emitting 2-axle and 3-axle trucks that would make deliveries at a warehouse. Based on guidance in Appendix E in the CalEEMod User Guide, 2-axle trucks should use the LHD1 classification, and 3-axle trucks should use MHD in the Final EIR. AQMD staff notes that these classifications were used for the Health Risk Assessment.

### **Construction Mitigation Measures**

7. In the Draft EIR, the lead agency has determined that project regional construction impacts exceed the AQMD recommended significance thresholds. AQMD staff therefore recommends the following changes and additional mitigation measures during the projected 12 month construction period in addition to the measures proposed starting on page 4.3-23 to further reduce ROG and NOx impacts, if applicable and feasible.

Recommended change:

4.3.6.2D All clearing, grading, earthmoving, or excavation activities shall cease when winds (as instantaneous gusts) exceed 25 miles per hour per SCAQMD guidelines in order to limit fugitive dust emissions.

Recommended addition:

- Limit the amounts of daily soil disturbance to the amounts analyzed in the EIR.
- Prohibit truck idling in excess of five minutes, both on- and off-site.

Further, other lead agencies in the region including LA County Metro, the Port of Los Angeles, and the Port of Long Beach have also enacted the following mitigation measures. AQMD staff recommends the following measures to further reduce air quality impacts from construction equipment exhaust:

- Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In

- addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

### **Average Vehicle Ridership**

8. Mitigation measure 4.3.6.5B lists as one of the measures the development of trip reduction plans that will achieve 1.5 average vehicle ridership for businesses with fewer than 100 employees. Because AQMD's rule 2202 has been modified<sup>5</sup> to only apply to businesses with at least 250 employees, the mitigation measure should be modified to include businesses with fewer than 250 employees, rather than 100 employees.

---

<sup>5</sup> <http://www.aqmd.gov/rules/reg/reg22/r2202.pdf>